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5 Attorneys for Defendant
DARDEN RESTAURANTS, INC. d/b/a/ YARD
6 HOUSE RESTAURANTS

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 FINAS D. BAREFIELD JR.,
12
13 Plaintiff,

14 v.

15 DARDEN RESTAURANTS, INC. d/b/a
YARD HOUSE RESTAURANTS,
16 Defendant.

Case No. 3:14-cv-03733-CRB

**SUPPLEMENTAL DECLARATION OF
THEODORA R. LEE IN SUPPORT OF
DEFENDANT'S MOTION TO ISSUE
SANCTIONS AND AWARD
ATTORNEYS' FEES AND COSTS**

Date: July 17, 2015
Time: 10:00 a.m.

Dept.: 6, 17thth Floor
Judge: Charles R. Breyer
Complaint Filed: August 18, 2014
Trial Date: None Set

1 I, THEODORA R. LEE, hereby declare as follows:

2 1. I am shareholder with Littler Mendelson, P.C. in San Francisco, California,
3 and am the attorney primarily charged with the defense of this action. The information set forth in
4 this declaration is based upon my personal knowledge, and if called to testify, I would be competent
5 to testify as to what is set forth herein.

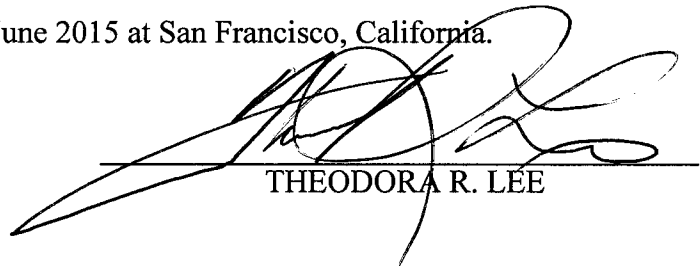
6 2. On June 9, 2015, Defendant filed its Notice of Motion, Motion and
7 Memorandum of Points and Authorities to Issue Sanctions and Award Attorneys' Fees and Costs.

8 3. Thereafter, on June 10, 2015, I was notified that Mr. Barefield engaged in
9 further fraud by sending an email to Eugene I. Lee, CEO of Darden Restaurants, Inc., attaching the
10 fraudulent Settlement Agreement wherein he unilaterally changed the settlement amount and
11 inquiring as to why he had not been paid. A true and correct of that email is attached hereto as
12 Exhibit A.

13 4. Defendant has now incurred additional monies now totaling \$6,994.00 in
14 attorneys' fees and costs in defending this action and in seeking enforcement of the settlement
15 agreement.

16 I declare under penalty of perjury under the laws of the United States and the State of
17 California that the foregoing is true and correct.

18 Executed this 11th day of June 2015 at San Francisco, California.

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THEODORA R. LEE

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